

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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| <p>----- X</p> <p>SHAW FAMILY ARCHIVES, LTD.,<br/>BRADFORD LICENSING, INC., JAMES E.<br/>DOUGHERTY, and VALHALLA<br/>PRODUCTIONS, LLC.</p> <p>Plaintiffs/Consolidated Defendants,</p> <p>v.</p> <p>CMG WORLDWIDE, INC. and MARILYN<br/>MONROE, LLC,</p> <p>Defendants/Consolidated Plaintiffs.</p> | <p>05 CV 3939 (CM)</p> <p>Honorable Colleen McMahon</p> <p>S.D. OF N.Y. W.P.</p> |
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U.S. DISTRICT COURT  
FILED

700 JUL 31 2006  
S.D. OF N.Y. W.P.

**NOTICE OF MOTION FOR ADMISSION PRO HAC VICE**

PLEASE TAKE NOTICE that, upon the Declaration of Michelle M. Craven submitted herewith, Defendant/Consolidated Plaintiff, MARILYN MONROE, LLC ("MML"), moves this Court, unopposed, on a date to be determined by this Court, at the United States Courthouse, 300 Quarropas Street, White Plains, NY 10601, for an Order pursuant to Rule 1.3(c) of the Local Civil Rules of the United States District Court for the Southern District of New York, admitting Jonathan G. Polak Pro Hac Vice.

Plaintiffs/Consolidated Defendants' counsel was made aware of this motion and has stated that he has no opposition to the Pro Hac Vice admission.

Dated: New York, New York  
July 19, 2006

GIBSON, DUNN & CRUTCHER LLP

By:

  
Michelle M. Craven (MC-8556)  
200 Park Avenue, 47th Floor  
New York, New York 10166  
(212) 351-4000

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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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|-------------------------------------|---------------------------|
| SHAW FAMILY ARCHIVES, LTD.,         | X                         |
| BRADFORD LICENSING, INC., JAMES E.  | :                         |
| DOUGHERTY, and VALHALLA             | :                         |
| PRODUCTIONS, LLC.                   | :                         |
| Plaintiffs/Consolidated Defendants, | 05 CV 3939 (CM)           |
| v.                                  | :                         |
| CMG WORLDWIDE, INC. and MARILYN     | :                         |
| MONROE, LLC,                        | Honorable Colleen McMahon |
| Defendants/Consolidated Plaintiffs. | :                         |
|                                     | X                         |

## **DECLARATION OF PERSON MOVING ADMISSION**

**Michelle M. Craven, being duly sworn, says:**

1. I am an associate of the firm of Gibson, Dunn & Crutcher LLP, counsel for Defendant/Consolidated Plaintiff, MARILYN MONROE, LLC ("MML") in the above-captioned action. I have been a member of the bar of this Court since December 2, 2003. I make this declaration in support of Defendants/Consolidated Plaintiffs' motion, pursuant to Rule 1.3(c) of the Local Civil Rules of this Court, for the admission of Jonathan G. Polak to the bar of this Court Pro Hac Vice.

2. Jonathan G. Polak is a director of the firm Sommer Barnard PC, counsel for Defendants/Consolidated Plaintiffs CMG and MML in this action. Mr. Polak is a member in good standing of the bar of the State of Indiana and the State Bar of Texas. (See Certificate issued by the Supreme Court of the State of Indiana, dated June 28, 2006, and the Certificate from the State Bar of Texas, dated July 3, 2006 attached hereto). Mr. Polak is familiar with the Federal Rules of Civil Procedure and has familiarized himself with the Rules of this Court.

3. Plaintiffs/Consolidated Defendants' counsel was made aware of this motion and has stated that he has no opposition to the Pro Hac Vice admission.

4. Accordingly, I respectfully request that Mr. Polak be admitted to the bar of this Court Pro Hac Vice.

Dated: New York, New York  
July 19, 2006

By:   
Michelle M. Craver (MC-8556)  
GIBSON, DUNN & CRUTCHER LLP  
200 Park Avenue, 47th Floor  
New York, New York 10166  
(212) 351-4000

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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|---|-----------------------------|
|   | X                           |
| SHAW FAMILY ARCHIVES, LTD.,<br>BRADFORD LICENSING, INC., JAMES E.<br>DOUGHERTY, and VALHALLA<br>PRODUCTIONS, LLC. | :                           |
| Plaintiffs/Consolidated Defendants,   | : 05 CV 3939 (CM)           |
| v.  | :                           |
| CMG WORLDWIDE, INC. and MARILYN<br>MONROE, LLC,   | : Honorable Colleen McMahon |
| Defendants/Consolidated Plaintiffs.   | :                           |
|   | X                           |

**DECLARATION OF PARTY SEEKING ADMISSION**

Jonathan G. Polak, being duly sworn, says:

1. I am a director of the firm of Sommer Barnard PC, counsel for

Defendants/Consolidated Plaintiffs CMG Worldwide, Inc. ("CMG") and Marilyn Monroe, LLC ("MML") in the above-captioned action.

2. I make this Declaration in connection with the Declaration of Michelle M.

Craven, dated July 19, 2006, in support of my admission Pro Hac Vice to the bar of this Court for the purpose of representing Defendants/Consolidated Plaintiffs CMG and MML in this matter.

3. Plaintiffs/Consolidated Defendants' counsel was made aware of this motion and has stated that he has no opposition to the Pro Hac Vice admission.

4. I have been duly admitted to practice law in the State of Indiana since May 17, 2000, and I am a member in good standing of bar of the Indiana State Bar (See Certificate issued by the Supreme Court of the State of Indiana, dated June 28, 2006, attached hereto). I have been

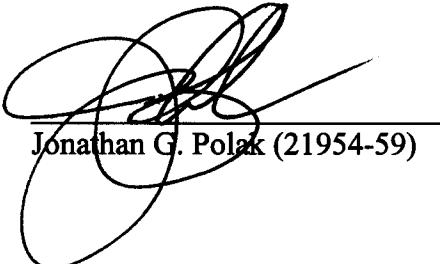
duly admitted to practice law in the State of Texas since November 4, 1994, and I am a member in good standing of bar of the Texas State Bar (See Certificate issued by the State Bar of Texas, dated July 3, 2006, attached hereto).

5. I am familiar with the facts of this case, and it would be in Defendants/Consolidated Plaintiffs CMG's and MML's interest for me to be permitted to appear and to participate in these proceedings.

6. I am familiar with the Federal Rules of Civil Procedure, and I have familiarized myself with the rules of this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Indianapolis, Indiana  
July 26, 2006



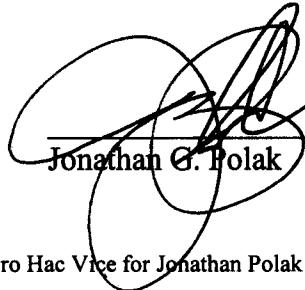
Jonathan G. Polak (21954-59)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 26<sup>th</sup> day of July, 2006, I caused a true and correct copy of the Notice of Motion for Admission Pro Hac Vice, Declaration of Person Moving Admission, Declaration of Party Seeking Admission, and unsigned Order, to be served by first class regular mail, on the following counsel:

Orin Snyder  
Michelle Craven  
Gibson, Dunn & Crutcher LLP  
200 Park Avenue  
47th Floor  
New York, NY 10166-0193  
Telephone: (212) 351-2400  
Facsimile: (212) 351-6335

Brian L. Greben  
Marcus & Greben  
1650 Broadway  
Suite 707  
New York, NY 10019  
Telephone: (646) 536-7602  
Facsimile: (516) 829-0008

  
\_\_\_\_\_  
Jonathan G. Polak

CMG - Shaw - final Notice of Motion for Admission Pro Hac Vice for Jonathan Polak DOC.DOC

SUPREME COURT OF  
THE STATE OF INDIANA



*Certification*

STATE OF INDIANA, SS:

I, Kevin S. Smith, Clerk of the Supreme Court of Indiana, do hereby certify that

JONATHAN GARLAND POLAK

is a member of the bar of said Court since admission on  
MAY 17th 2000, and is in good standing therein.

GIVEN under my hand and the seal of said Court at Indianapolis, Indiana, this 28th day of JUNE, 20 06.

*Kevin S. Smith*

KEVIN S. SMITH  
CLERK, SUPREME COURT OF INDIANA

# STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

July 3, 2006

Re: Jonathan G. Polak, State Bar Number 00791458

To Whom It May Concern:

This is to certify that Mr. Jonathan G. Polak was licensed to practice law in Texas on November 4, 1994, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues and attorney occupation tax; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension.

No previous disciplinary sanctions have been entered against Mr. Polak's law license.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen A. Moyik".

Stephen A. Moyik  
Assistant Disciplinary Counsel

SAM/et

